

August 11, 1994

CD-94-17 (HD,NRHD)

Dear Manufacturer:

Subject: Notice of Workshop for Certification Implementation Strategy for Nonroad Compression-Ignition Engines at or above 37 Kilowatts

The purpose of this letter is to present EPA's strategy for certifying nonroad compression-ignition engines at or above 37 kW (hereafter referred to as "large nonroad diesel engines") and to announce an informal workshop for manufacturers of these engines.

Background

The final rule for large nonroad diesel engines was signed by the EPA Administrator on May 31, 1994 and was published in the Federal Register on June 17, 1994 (Vol. 59, No 116, p. 31306.) These regulations contain emission standards and certification requirements for new engines beginning in 1996, with optional early certification one year prior to the implementation date for banking of NOx emission credits. Please refer to the Federal Register notice for the details of this regulation.

The requirements set forth in the final rule were patterned after EPA's heavy-duty highway regulations, because of similarities in design and emission control strategies between large highway diesel engines and large nonroad diesel engines. EPA also expressed in the final rule its intention to harmonize its regulations with those of the California Air Resources Board (CARB) (and of the European Community, once their regulations have been adopted) where possible.

Certification Strategy

In developing a certification program strategy, EPA likewise intends to utilize its experience from the on-highway certification

program and to coordinate with CARB to implement compatible and parallel certification programs. Activities now under consideration are the format for application for certification, submission of test data, confirmatory testing by EPA, issuance of certificates of conformity, and in-use compliance and enforcement. While utilizing its past experience with highway certification, EPA also wishes to take advantage of the opportunities provided by the

newness of the nonroad program to streamline, create efficiencies, correct deficiencies, and to generally refresh the certification process.

Workshop

To achieve the goals stated above, we invite you to attend a workshop to be held at the Ann Arbor NVFEL on September 20th from 1:00 to 4:00 PM. The workshop will allow you to meet the key EPA personnel you will be working with, to see the National Vehicle and Fuel Emissions Laboratory, to learn more about the EPA nonroad certification and in-use compliance programs, and to discuss your questions and input in an informal forum.

EPA is already aware of a number of certification issues and questions which can be discussed at the workshop. We encourage you to submit in advance (in writing, please) any technical issues or questions which we can add to the agenda.

Attached to this letter is a list of possible agenda items for the workshop. Please submit additional items to us by no later than a week prior to the meeting. Items will be discussed at the workshop as time permits. Also, please alert us in advance if your organization plans to attend the workshop, and the number of people who will attend.

Communications

Policy: EPA decisions and policies regarding nonroad certification will be communicated via guidance letters. We are compiling a contact list of manufacturers who intend to certify nonroad diesel engines. Please provide the name, address, telephone and fax numbers of the key person who will be handling the certification activities in your organization for purposes of sending any guidances and notices.

Industry Meetings: The Office of Mobile Sources (OMS) holds bi-monthly industry meetings chaired by OMS Director Richard Wilson during which status reports on various OMS regulatory activities are given and industry questions are answered. Participation in these meetings is voluntary. The next industry meeting is scheduled for September 21, 1994, the day after the workshop. If you have not previously attended an industry meeting, this would be an opportunity to do so. Questions for industry meetings must be submitted one month in advance in writing to Mary Green, Certification Division, US EPA, 2565 Plymouth Road, Ann Arbor, MI

48105. Because this deadline has expired, your questions should be presented at the workshop instead.

Interim EPA contact: The key interim EPA contacts for large diesel nonroad certification issues are Linda Hormes at (313)668-4502, Lisa Snapp at (313)668-4282 and John McCarthy at (313)668-4345. You may contact them for any of the above reasons (workshop agenda items, workshop attendance, contact list information, etc.) The Certification Division FAX number is (313)741-7869.

Sincerely,

Robert E. Maxwell, Director
Certification Division

Attachment

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DRAFT AGENDA OF TOPICS FOR NONROAD CERTIFICATION WORKSHOP

September 20, 1994

1:00 - 4:00 PM

National Vehicle and Fuels Emission Laboratory

- 1:00 Background information
- 1:15 Introduction of key EPA personnel
- 1:30 Certification presentation:
 - Overview of the certification process
 - Guidance on specific topics
- 2:30 Manufacturer Operations Division presentation
 - In-use recall
 - SEA
 - Importation
 - Waivers
- 3:30 Wrap-up, final questions
- 4:00 Optional tour of NVFEL